

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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IN RE: TERRORIST ATTACKS ON ) **Civil Action No. 03. MDL 1570 (GBD)**  
SEPTEMBER 11, 2001 )  
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**DEFENDANT MUSLIM WORLD LEAGUE'S 26(a)(1) INITIAL DISCLOSURES**

Defendant Muslim World League ("MWL"), by and through its undersigned counsel, makes the following initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1). These initial disclosures are based on information reasonably available to MWL as of the date hereof. The disclosures herein are provided without prejudice to the rights of MWL to identify additional witnesses or evidence. Further, MWL reserves the right to supplement these initial disclosures.

**I. Individuals With Relevant Discoverable Information**

The following individuals are likely to have discoverable information that MWL may use to support its defenses. MWL does not consent to or authorize any communications with its employees, agents, officers, or directors, whether formerly or presently associated or employed by MWL and does not consent to or authorize any other communication prohibited by any applicable rule of professional conduct.

**1. Mr. Sameer Al Radhi**

Address: Mecca, Saudi Arabia

Contact Information: Mr. Al Radhi can be reached through counsel

Subject: Custodian of documents

**2. Ahmed Thomson, Esq.**

Address: Wynn Chambers, Winchester House 259-269 Old Marylebone Road, NW1 5RA London, United Kingdom

Contact Information: Atty. Thomson can be reached through counsel

Subject: MWL's operations in the United Kingdom subject to attorney-client privilege

3. **Mr.Ahmed Makdom** , head of MWL London Office  
Address: 46 Goodge St London, W1T 4LU, United Kingdom  
Contact Information: Mr.Ahmed Makdom can be reached through counsel  
Subject: MWL's operations in the United Kingdom
4. **Mr. Saud Algreen** , head of MWL Madrid Office  
Address: Madrid, Spain  
Contact Information: Mr. Saud Algreen can be reached through counsel  
Subject: MWL's operation in Spain
5. **Mr.Abdul Rahman Al Qasimi AlBakali, Contact person of MWL Gibraltar Office**  
Telephone No.: 0021270321082  
Contact Information: Mr. AlBakali can be reached through counsel  
Subject: MWL's operations in Gibraltar and Northern Africa
7. **Mr.Mohamed Alhasani**, Manager of Overseas Offices  
Address:P.O. Box 537, Makka, Audi Arabia  
Contact Information: Mr.Mohamed Alhasani can be reached through counsel  
Subject: How MWL overseas offices are regulated.
8. **Mr. Fahad bin sand Alharbi** , head of MWL Indonesia Office  
Address: Jalan Raya Cipinang Jaya No. 90, Jakarta Timur 13410  
P.O. Box 4563, Jakarta 12045 Indonesia  
Contact Information:Mr. Fahad bin sand Alharbi can be reached through counsel  
Subject: MWL's operations in Indonesia.
9. **Mr. Saeed Nowefae Alhazmi**, head of MWL Malaysia Office  
Address: Muslim World League Office ,Balai Islam, First Floor  
No. 250-D Jalan IPOH 51200 Kuala Lumpur, Malaysia  
Contact Information: Mr. Saeed Nowefae Alhazmi can be reached through counsel  
Subject: MWL's operations in Malaysia Office.
10. **Mr. Hussein Daifallah Almalki**, head of MWL Jordan Office  
Address: P.O. Box 811811 Amman Jordan  
Contact Information: Mr. Hussein Daifallah Almalki can be reached through counsel  
Subject: MWL's operations in Jordan Office.
11. **Mr. Fadel Khloud** , head of MWL Nigeria Office  
Address: Muslim World League Office, P.O. Box: 8570 Wuse Abuja, Nigeria  
Contact Information: Mr. Fadel Khloud can be reached through counsel  
Subject: MWL's operations in Nigeria Office.
12. **Mr. Ismail Dream** , head of MWL Senegal Office  
Address: Bureau de la League Islamique Mondiale, Rue Beranger Ferraud X

Masclary 1-E Etage Dakar, P.O.Box: 3860  
Contact Information: Mr. Ismail Dream, can be reached through counsel  
Subject: MWL's operations in Senegal Office.

13. **Mr. Abdulaziz Mohamed Salem Kamis**, head of MWL South Africa Office  
Address : Liaison Office. South Africa Region P.O. Box: 4406  
Randburg 2125 Johannesburg, South Africa\\  
Contact Information: Mr. Abdulaziz Mohamed Salem Kamis can be reached through counsel  
Subject: MWL's operations in South Africa Office.
14. **Mr. Sami Alharbi** , head of MWL Kenya Office  
Address: Muslim World League Office  
Waiyaki Way Road  
West Land Area  
P.O. Box: 52871  
Nairobi, Kenya  
Contact Information Mr. Sami Alharbi, can be reached through counsel  
Subject: MWL's operations in Kenya Office.
15. **Mr. Farid Alkotani** , head of MWL Italy Office  
Address: Viale Della Moschea 85  
00197 Roma, Italy  
Contact Information: Mr. Farid Alkotani, can be reached through counsel  
Subject: MWL's operations in Italy Office.
16. **Mr. Hashem Almahrogi** , head of MWL Austria Office  
Address: Muslim World League Office  
AM Bruckhaufen 3  
A - 1210 Vienna, Austria  
Contact Information: Mr. Hashem Almahrogi can be reached through counsel  
Subject: MWL's operations in Austria Office.
17. **Mr. Abdul Rahim Kortic** , head of MWL Denmark Office  
Address: Muslim World League Office  
Vodroffsvej 8  
1900 Frederikseberg  
Kobenhaven, Denmark  
Contact Information: Mr. Abdul Rahim Kortic can be reached through counsel  
Subject: MWL's operations in Denmark Office.
18. **The names and address of the initial Directors of MWL North America are:**
  - a. **Dr. Ahmad H. Sakr**  
P.O Box 140

Lombard, IL 60148

**b. Dr. Vaqar A. Hamdani**

635 East 14<sup>th</sup> Street  
New York, 10009

**c. Mr. Dawud Assad**

99 Woodview Drive  
Old Bridge, New Jersey

**d. Dr. Muzamil H. Siddiqi**

5 Peabody Terrace, # 22  
Cambridge, Mass. 02138

**e. Dr. Osman Ahmed**

190 Sherman Avenue  
Glen Ridge, New Jersey 07028

**f. Dr. Omar Z. Ghobashy**

85 Wildwood Road  
New Rochelle, New York 10804

**g. Mr. Amir Al- Islam**

44 South Munn Avenue  
East Orange, New Jersey 07018

**19. Mr. El-Ayouty**

Address: P.O. Box 780, Jeddah 21241

Contact Information: Mr. El-Ayouty can be reached through counsel

Subject: Has knowledge of MWL auditors, accountants, and legal department

**20. Mr. Rahmatullah Enayatullah Ahmed**, Director General for Studies & Conferences.

Contact Information: Mr. Ahmed can be reached through counsel

**21. Mr. Mahmud Said**, Auditor for MWL HQ and the MWL overseas branches

Contact Information: Mr. Said can be reached through counsel

**22. Mr. Ali Al-Thaqafi**, Personell Director

Address: P.O. Box 537, Makkah, S A

Contact Information: Mr. Al-Thaqafi can be reached through counsel

Subject: Has knowledge of MWL employee files

**23. Mr. Ahmad Qurban**

Address: P.O. Box 537, Makkah, SA

Contact Information: Mr. Qurban can be reached through counsel

Subject: Has knowledge of MWL correspondence files

**24. Mr. Musa Al-Mogasme**

Address: P.O. Box 537, Makkah, S A

Contact Information: Mr. Mogasme can be reached through counsel

Subject: Has knowledge of MWL financial files

**II. Categories and Location of Relevant Documents**

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(ii), MWL provides the following description, by category and location, of all documents electronically stored information, and tangible things in possession, custody, or control that it may use to support its defenses.

- 1. Documents related to MWL's structure as a charitable organization**  
- Located in MWL Binder 2, which is available in undersigned counsel's office\*
- 2. Documents related to MWL's banking accounts, financial statements, balance sheets, income statements, and annual reports**  
- Located in MWL Binder 1 and 15 which is available in undersigned counsel's office\*<sup>1</sup>
- 3. Documents relating to projects undertaken and financed by MWL**  
- Located in MWL Binder 4 which is available in undersigned counsel's office\*
- 4. Documents are being returned to MWL's counsel from the FBI concerning the raid on MWL Virginia office.** Counsel will make them available upon receipt thereof.
- 5. Documents are being returned to MWL's counsel from IRS criminal section regarding revocation of MWL's 501(c)(3) non-profit status.** Counsel will make them available upon receipt thereof.

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\* All binders have already been produced and inspected by Plaintiff's counsel

6. **Documents related to MWL activities in Spain are located in Madrid.**
7. **Documents related to MWL activities in the United Kingdom are located in London.**
8. **Documents related to MWL activities in the United States are located in New York City**
9. **Documents related to MWL activities in Southern Spain and North Africa are located in Gibraltar.**

**All of the aforesaid documents are located in the following addresses:**

- **Martin McMahon & Associates**  
**1150 Connecticut Ave., N.W., Suite 900**  
**Washington, D.C. 20036**
  - The firm has in its possession MWL Binders 1-21, which have already been reviewed by Plaintiff's counsel or their Arabic translator
- **Any and all other aforesaid documents will be available for inspection in Mecca or Jeddah, Saudi Arabia**

### **III. Computation of Damages**

MWL has not asserted a claim for damages against any other party in this action.

### **IV. Insurance**

At the present time, MWL is unaware of any insurance agreement under which an insurance business may be liable to satisfy all or part of a judgment that may be entered in this action, or to indemnify or reimburse payments made to satisfy such a judgment.

Respectfully Submitted,

MARTIN F. MCMAHON & ASSOCIATES

/s/ Martin F. McMahon,

Martin F. McMahon, Esq. #196642

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*Counsel for Muslim World League*